

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ROME DIVISION

FILED IN CHAMBERS
U.S.D.C ATLANTA

Date: Oct 05 2021

KEVIN P. WEIMER , Clerk

By: s/Kari Butler
Deputy Clerk

UNITED STATES OF AMERICA

v.

KEVIN OWEN BURRESS

Criminal Action No.
4:21-MJ-00051

Government's Motion for Detention

The United States of America, by counsel, Kurt R. Erskine, Acting United States Attorney, and Annalise K. Peters, Assistant United States Attorney for the Northern District of Georgia, moves for detention under 18 U.S.C. §§ 3142(e) and (f).

1. Eligibility of Case

This case is eligible for a detention order because this case involves:

Any felony that is not otherwise a crime of violence but which involves the possession/use of a firearm, destructive device, or any other dangerous weapon; and

A serious risk that the defendant will threaten, injure, or intimidate a prospective witness or juror, or attempt to do so.

2. Reason for Detention

The Court should detain defendant because there are no conditions of release that will reasonably assure the appearance of the person as required and the safety of any other person and the community.

3. Rebuttable Presumption

The United States will not invoke the rebuttable presumption that no condition or combination of conditions will reasonably assure the appearance of the defendant as required and the safety of the community pursuant to 18 U.S.C. § 3142(e)(3).

The United States will not invoke the rebuttable presumption that no condition or combination of conditions will reasonably assure the safety of any other person and the community pursuant to 18 U.S.C. § 3142(e)(2).

4. Time for Detention Hearing

The United States requests the Court conduct the detention hearing after continuance of 3 days.

The United States requests leave of Court to supplement this motion with additional grounds or presumptions for detention.

Dated: October 5, 2021.

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Respectfully submitted,

KURT R. ERSKINE
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/s/ ANNALISE K. PETERS
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Ga. Bar No. 550845

Certificate of Service

I served this document today by emailing a copy to defense counsel:

Nicole Kaplan

October 5, 2021

/s/ ANNALISE K. PETERS

ANNALISE K. PETERS

Assistant U.S. Attorney